



Stehekin & Newhalem Firing Range Cleanup Fact Sheet and FAQs

The National Park Service (NPS) is exercising lead agency responsibility by conducting a non-time-critical removal action in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to eliminate the potential for lead impacts to human and ecological health at the Stehekin and Newhalem firing ranges within North Cascades National Park Complex.

Background

Government agencies and the public have used lead shot for decades at both firing ranges. Lead shot is not considered a hazardous waste at the time it is discharged from a firearm because discharge is within the normal and expected use pattern of the manufactured product. However, if lead shot is discarded (i.e. abandoned) and left to accumulate long after serving the intended purpose, it becomes a solid and/or hazardous waste subject to Resource Conservation and Recovery Act (RCRA) regulations. To reduce liability with regard to spent lead shot posing actual or potential imminent and substantial endangerment under the RCRA statute, and to prevent risk to human health and the environment at these firing ranges, the NPS is pursuing a CERCLA response action.

What is CERCLA and what does it do?

CERCLA is a response and reporting act (not a regulatory act) that authorizes cleanup responses when a hazardous substance such as lead is released into the environment. CERCLA also provides a framework for accomplishing those actions, including cleanup cost recovery from potentially responsible parties. Pursuant to CERCLA, when a federal facility removal action is planned to be the only response action at a site, the lead agency should ensure applicable or relevant and appropriate requirements (ARARs) and public involvement are implemented in a manner consistent with requirements for a permanent solution. This entails evaluating overall protection of human health and the environment; complying with ARARs, which determine the technical standards for cleanup activities; reducing the toxicity, mobility, or volume of the hazardous substance through treatment; and ensuring both short-term and long-term effectiveness during the evaluation of removal alternatives.

How are cleanup standards determined?

Federal agencies are required to consult with the State for removal actions and consider any State-specific ARARs. In the State of Washington, the Model Toxics Control Act (Chapter 70.105D RCW) serves as the state counterpart to CERCLA and, combined with the Model Toxics Control Act Cleanup Regulation (173-340 WAC), establishes cleanup levels that identify at what level a particular hazardous substance does not threaten human health or the environment. Lead concentrations in soil are expected to be protective of specific receptors as follows:*

Hazardous Substance	Human Health & Unrestricted Land Use	Plants	Wildlife	Soil Biota
Lead	250 ppm	50 ppm	118 ppm	500 ppm

*Citation: Washington (State), Department of Ecology, Model Toxics Control Act Cleanup Regulation, Chapter 173-340 WAC, Table 740-1 Method A Soil Cleanup Levels for Unrestricted Land Uses and Table 749-3 Ecological Indicator Soil Concentrations (mg/kg) for Protection of Terrestrial Plants and Animals.

Following consultation with the State and other subject matter experts regarding these cleanup standards, the NPS has identified **50 ppm** lead as the threshold demarking an acceptable level of risk. Attaining this level of cleanup is expected to protect both human and ecological health in perpetuity and in accordance with the NPS mission.

How will the preferred removal action be selected?

The preferred alternative is evaluated and selected based on 1) *effectiveness* at meeting the target cleanup level, 2) technical and administrative *implementability*, and 3) consideration for *total lifecycle cost*. The NPS has scheduled public meetings during the public comment period to review information provided in the Engineering Evaluation and Cost Analysis (EE/CA) regarding cleanup alternatives. The NPS will consider and respond to significant public comments when selecting the final alternative.

Next Steps

Following the public comment period, an Action Memorandum will be prepared to document the NPS's decision to undertake the selected non-time-critical removal action at the Stehekin and Newhalem firing ranges. Funding requests for the removal action will be developed and submitted to the NPS Environmental Management Program based on cost estimates provided in the EE/CA. The NPS will search for and identify potentially responsible parties and attempt to share or recover cleanup costs.

The Stehekin firing range will be closed in accordance with the Final Stehekin River Corridor Implementation Plan / Final Environmental Impact Statement Record of Decision (2013) to reroute a segment of the Stehekin Valley Road because the proposed alignment will pass directly behind the target area of the firing range, posing an unacceptable safety hazard to the public.

Best Management Practices (BMPs) for controlling, containing, and regularly removing lead shot will be implemented at the Newhalem firing range, which is expected to remain in operation for official use only due to the expense and limited availability of alternatives for NPS law enforcement personnel.

Where can I get more information?

The Administrative Record, which contains the body of documents that the NPS is relying upon to inform the selection of a response action to address lead contamination at the Stehekin and Newhalem firing ranges, can be found online at <http://parkplanning.nps.gov/NOCAFiringRanges>. Hard copies are available during normal business hours at the following sites:

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